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Attorneys for Defendants Ellen Rosenblum, Brad Avakian, Kate Brown, Ben Cannon, Lynne Saxton

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON

BENJAMIN BARBER,

Plaintiff,

v.

MEAGAN VANCE in her personal capacity  
and ELLEN ROSENBLUM, BRAD  
AVAKIAN, KATE BROWN, BEN  
CANNON, LYNNE SAXTON in their official  
capacity,

Defendants.

Case No. 3:16-cv-02105-AC

STATE DEFENDANTS' RESPONSE TO  
PLAINTIFF'S MOTION TO CONVENE  
SPECIAL GRAND JURY UNDER  
18 U.S.C. § 3332

Defendants Ellen Rosenblum, Brad Avakian, Kate Brown, Ben Cannon, Lynne Saxton,  
and Marie Atwood (to the extent Ms. Atwood remains a defendant), appearing specially and  
without waiver of any defense, respectfully advise the Court that they do not intend to respond to

Plaintiff's "Motion to Convene Special Grand Jury Under 18 USC 3332" (Docket 135), and do not believe further briefing or argument would assist the Court.

DATED October 4, 2017.

Respectfully submitted,

ELLEN F. ROSENBLUM  
Attorney General

s/ Jesse B. Davis  
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**CERTIFICATE OF SERVICE**

I certify that on October 4, 2017, I served the foregoing STATE DEFENDANTS' RESPONSE TO PLAINTIFF'S MOTION TO CONVENE SPECIAL GRAND JURY UNDER 18 USC § 3332 upon the parties hereto by the method indicated below, and addressed to the following:

Benjamin Barber  
Bkg. # 17-07936  
Washington County Jail  
215 SW Adams MS35  
Hillsboro, OR 97213-3874  
Plaintiff *Pro Se*

☐ HAND DELIVERY  
☒ MAIL DELIVERY  
☐ OVERNIGHT MAIL  
☐ SERVED BY E-FILING

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Of Attorneys for Defendant Vance

☐ HAND DELIVERY  
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